

**UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT**

MIGRANT JUSTICE, a Vermont corporation,
on its own behalf and on behalf of its members;
JOSE ENRIQUE BALCAZAR SANCHEZ;
ZULLY PALACIOS RODRIGUEZ; JOSE
VICTOR GARCIA DIAZ,

Plaintiffs,

v.

CHAD WOLF, Secretary of the U.S.
Department of Homeland Security (DHS);
NATHALIE ASHER, Acting Executive
Associate Director, U.S. Immigration and
Customs Enforcement (ICE); MATTHEW
ALBENCE, ICE/DHS Executive Associate
Director, Enforcement and Removal
Operations; UNITED STATES OF AMERICA,

Defendants.

Case No. 5:18-cv-192 (GWC)

STIPULATION OF DISMISSAL WITH PREJUDICE

Plaintiffs Migrant Justice, Jose Enrique Balcazar Sanchez, Zully Palacios Rodriguez, and Jose Victor Garcia Diaz and Defendants Chad Wolf,¹ Nathalie Asher, and Matthew Albence, in their official capacities at the U.S. Department of Homeland Security (“DHS”) and U.S. Immigration and Customs Enforcement (“ICE”), and the United States of America, having entered into a settlement, hereby stipulate to the dismissal with prejudice of the above-captioned action pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure. The parties shall bear and be solely responsible for their own respective attorneys’ fees, costs, and expenses incurred in connection with and related to this action.

¹ Pursuant to Fed. R. Civ. P. 25(d), Acting Secretary Wolf is substituted for former Acting Secretary Kevin McAleenan.

DATED at Brooklyn, New York on this 28th day of October 2020.

SETH D. DUCHARME
Acting United States Attorney
Eastern District of New York

By: /s/ Seth D. DuCharme
Special Attorneys Acting Under Authority
Conferred by 28 U.S.C. § 515
Assistant United States Attorneys
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201
(718) 254-6028/6616
Rachel.Balaban@usdoj.gov
Alex.Weinberg@usdoj.gov

Counsel for Federal Defendants

DATED at New York, New York this 28th day of October 2020.

By: /s/ Joel M. Cohen
Joel M. Cohen*
Amanda M. Aycock*
Jaclyn Neely*
GIBSON, DUNN & CRUTCHER
200 Park Avenue
New York, NY 10166
(212) 351-4000
JCohen@gibsondunn.com
AAycock@gibsondunn.com
JNeely@gibsondunn.com

Lia Ernst
James M. Diaz
ACLU FOUNDATION OF VERMONT
P.O. Box 277
Montpelier, VT 05601
(802) 223-6304
Lernst@acluvt.org
Jdiaz@acluvt.org

Claudia Wilner*

NATIONAL CENTER FOR LAW AND
ECONOMIC JUSTICE
275 Seventh Avenue, Suite 1506
New York, NY 10001
(212) 633-6967
Wilner@nclej.org

Angelo Guisado*
Ghita Schwarz*
Guadalupe Aguirre*
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th floor
New York, NY 10012
(212) 614-6454
Aguisado@ccrjustice.org
Gschwarz@ccrjustice.org
Laguirre@ccrjustice.org

Trudy S. Rebert*
NATIONAL IMMIGRATION LAW CENTER
PO Box 721361
Jackson Heights, NY 11372
(646) 867-8793
rebert@nilc.org
Joshua Stehlik*
Sarah Kim Pak*
NATIONAL IMMIGRATION LAW CENTER
3450 Wilshire Blvd, #108-62
Los Angeles, CA 90010
(213) 639-3900
Stehlik@nilc.org
Kimpak@nilc.org
Max Wolson*
NATIONAL IMMIGRATION LAW CENTER
P.O. Box 34573
Washington, D.C. 20043
(202) 216-0261
Wolson@nilc.org

Counsel for Plaintiffs

** Appearing Pro Hac Vice*